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**UNITED STATES DISTRICT COURT**

**FOR THE EASTERN DISTRICT OF CALIFORNIA**

FLOR JIMENEZ, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

AYRES HOTEL COMPANY, INC. d/b/a  
AYRES HOTELS, a California corporation;  
and DOES 1 to 10, inclusive,

Defendants.

Case No.: 2:22-cv-00867-DAD-KJN

*Assigned to District Judge Dale A. Drozd*

**JOINT STIPULATION TO DISMISS CASE  
WITH PREJUDICE PURSUANT TO F.R.C.P.  
RULE 41(A); [PROPOSED] ORDER**

Complaint Filed: May 20, 2022

Trial Date: April 8, 2024

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff Flor Jimenez and Defendant Ayres Hotel Company, Inc. d/b/a Ayres Hotel stipulate and jointly request that this Court enter a dismissal with prejudice as to Plaintiff's individual claims in their entirety and without prejudice as to the claims of absent putative class members in the above-entitled action. Each party shall bear her or its own fees and costs.

Dated: April 24, 2023

**WILSHIRE LAW FIRM, PLC**

/s/ Carolin K. Shining

Thiago M. Coelho, Esq.  
Carolin K. Shining, Esq.  
*Attorneys for Plaintiff*

Dated: April 24, 2023

**THE KARLIN LAW FIRM LLP**

/s/ L. Scott Karlin

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Rex T. Reeves, Esq.  
Dan T. Danet, Esq.  
*Attorneys for Defendant*

**SIGNATURE ATTESTATION**

I hereby attest that all signatories listed above, on whose behalf this joint stipulation is submitted, concur in the filing's content and have authorized the filing.

Dated: April 24, 2023

**WILSHIRE LAW FIRM, PLC**

/s/ Carolin K. Shining

Carolin K. Shining  
*Attorneys for Plaintiff*